

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JEFF HULBERT, *et al.*

*

Plaintiffs,

*

v.

*

Case No. 1:18-cv-00461-SAG

SGT. BRIAN T. POPE, *et al.*

*

Defendants.

*

* * * * *

JOINT STATUS REPORT

Plaintiffs Jeff Hulbert, Kevin Hulbert, and Maryland Shall Issue, Inc., along with Defendants Sgt. Brian T. Pope and Col. Michael Wilson, hereby submit this Joint Status Report in accordance with this Court's order on June 10, 2020, *see* ECF 61, which ordered "a report on the status of this case on or before June 17, 2020."

Production of State Documents

The State was ultimately able to procure e-discovery software in time to remotely review and produce responsive documents to a subpoena issued to the State. The State has been providing a rolling production of documents responsive to the subpoena on a weekly basis. It has made seven productions to date. Based on how long it has taken to review documents—totaling more than 20,000 pages to date—the State expects two more rolling productions to fully complete its production obligation to the plaintiffs.

Motion to Compel

Counsel for plaintiffs have indicated an intent to pursue a motion to compel related to the documents being produced in response to the subpoena.

Additional Discovery

The parties agreed to any reasonable discovery arising from the documents produced in response to the subpoena if the basis for the additional discovery was not otherwise known prior to receiving the documents.

Dispositive Motions

The parties request that the deadline be set after all discovery matters have been fully resolved.

Proposed Schedule

The plaintiffs respectfully request that a telephonic status conference should be set for four weeks after the filing of this status report. The defendants do not oppose the request. If this Honorable Court believes that a telephonic status conference would be beneficial, then the defendants request that the subject matter(s) to be discussed are included with the order so as to be adequately prepared for the telephonic status conference.

[SIGNATURES ON NEXT PAGE]

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on 17th day of June, 2020, a copy of the foregoing joint status report was served by CM/ECF on:

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